

A-0105-000317

instead be regulated by CERCLA and RCRA under the IAG. Further, EPA stated that the continued use of any ponds for the routine containment of spills is unacceptable. In addition, the Division has recently put DOE on notice that future spray evaporation and water transfer between ponds will require a hazardous waste determination of the affected water (Gary Baughman to Frazer Lockhart, 10/14/92). On top of these items, the Colorado Department of Health, Water Quality Control Commission is conducting hearings on the current and future water quality standards for Segment 5 of Walnut Creek. Segment 5 includes all the ponds considered in this IM/IRA except the Landfill Pond. Therefore, although this IM/IRA was precipitated by the change in the NPDES compliance requirements, other relevant actions are taking place which reinforce the need for implementation of a water management IM/IRA for the ponds.

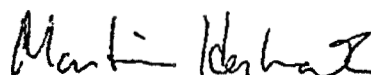
For these and other reasons in the June 26, 1992 letter, EPA strongly urged DOE to initiate scoping activities for an IM/IRA. Since no DOE initiated action has taken place to date, the agencies now request and require that IM/IRA scoping and development commence immediately.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 692-3356, Harlen Ainscough (CDH) at 692-3337 or Bill Fraser (EPA) at 294-1081.

Sincerely,



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